

# **EXHIBIT B**

Hi Jonah,

Can you confirm if you wish to confer and suggest a time and date that is suitable for you. 10am -12 noon pacific time is good for me.

Also as I have mentioned I do have the original 3D Maya files from Iron Sky Do you think it would be helpful for me to give you a shared screen demonstration on zoom of some of the files or any other demonstration that would help you understand how 3D animation is created?

Kind regards

Trev

See videos attached for some examples of my work.

<https://www.youtube.com/watch?v=v1jg2x6RwNA>

<https://www.youtube.com/watch?v=i3MSphdZO6A>

<https://www.youtube.com/watch?v=t6wwJ0JaSiM>

<https://www.youtube.com/watch?v=Nxx82h2dN-I>

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**Jonah Harrison** <jharrison@aretelaw.com>  
To: Trevor Baylis <trevor.baylis@gmail.com>  
Cc: Jeremy Roller <jroller@aretelaw.com>

29 March 2024 at 19:46

Mr. Baylis,

If you would like to meet and confer, we will do that, but could you please provide a list of the items you would like to discuss?

I propose 11:00 PST Thursday April 4.

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**Trevor Baylis** <trevor.baylis@gmail.com>  
To: Jonah Harrison <jharrison@aretelaw.com>  
Cc: Jeremy Roller <jroller@aretelaw.com>

30 March 2024 at 10:30

Hi Jonah,

I would like to meet and confer in order to facilitate a more economic resolution of the dispute. My requests for admissions are supposed to be part of my good faith attempts to narrow the issues and to prevent 'unnecessary side quests' which would be a waste of time and resources of the courts.

I'm not convinced by your previous answers to my submitted admissions because you don't explain your reasoning. Your answer is that they require "legal conclusions" but In my opinion they are just facts which in good faith requires you to qualified your answer. For instance,

Why would Iron Sky not be considered a Berne convention work? (RFA set 2)

Why would Valve believe they qualify for Safe-Harbour protections when they can monetize infringing material and have the ability to control it (RFA set 1)

BAYLIS\_I

Valve can't be sued by Topware Entertainment as they lack standing (USC17 §103(a)) because Topware are also infringing copyright but are subject to EU directives not the US DMC Act. That is to say I would have to sue them in Germany under German law (Berne art 5) not the US as Topware could claim lack of jurisdiction and I would be wasting my time trying to even serve them!

As I have mentioned before this case revolves around the Chain of Title and who genuinely has standing to seek "remedies and protections". In my view if Valve were able to grasp that only the 3D artist have standing to protect the work due to the fact they maintained their rights and didn't "assign" or "sell" them to Producers because there are no "work for hire" laws in Germany or the Nordics let alone the fact that no actual "work for hire" contracts exists in any case.

So these things should be discussed

Iron sky chain of title is broken so,

1. Who has standing for "remedies and protections" when it comes to the animated sequences and 3D work of Iron Sky?
  2. No "work for hire" laws in Germany or Nordics
  3. No corporate ownership possible in Germany (Topware Entertainment are German publishers)
  4. Iron Sky Universe has lack of standing for "remedies and protections". Eventual bankruptcy
  5. Blind Spot Pictures has lack of standing for "remedies and protections". Eventual bankruptcy
  6. Myriad Pictures has lack of standing for "remedies and protections". No foreclosure of copyrights rules in Germany and Nordics
- "Article 42  
Copyright shall not be subject to legal seizure as long as the copyright remains with the author"  
<https://wipo.lex-res.wipo.int/edocs/lexdocs/laws/en/fi/fi001en.pdf>
7. Topware Entertainment has lack of standing for "remedies and protections".
  8. Valve Corporation has lack of standing for "remedies and protections".
  9. How to fix the chain of title for Iron Sky so that the work can be exploited without further legal problems.
  10. Presumption of authorship under Berne article 15
  11. Who has actually has legitimate US copyright office registration and what for. Script? 3D artworks? Actual Movie?
  12. False Registration of Copyrights by Myriad Pictures. Due to no foreclosure of copyrights rules in Germany and Nordics.
  - 13. Should Valve sue Topware Entertainment for misrepresentations in their counter-notice.**

Kind regards

Trev